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January 22, 2004

The Honorable Catherine C. Blake
United States District Judge
United States District Court for the
District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *National Mortgage Warehouse, LLC v. Bankers First*
       Mortgage Co., Inc., et. al
       Case No. CCB-00-CV-2881

Dear Judge Blake:

        I received a fax copy of a letter dated January 19, 2004, from Mr. Applefeld
to the Court regarding the above-captioned case.   In that letter, Mr. Applefeld
referenced a letter submitted to the Court on October 10, 2003, regarding
outstanding discovery issues.

        I called Mr. Applefeld yesterday and informed him that neither Susan
Amiot nor I had received a copy of their October 10th letter to the Court, nor had
we received any other correspondence relating to the case. In checking the ECF
system, I have realized that this firm is not listed as counsel of record for Diane
Baklor in this matter. The ECF files reflect that Kramon & Graham was listed as
counsel for Mrs. Baklor, though that firm's representation terminated on October
16, 2002.   Accordingly, I have today filed our Notice of Appearance on behalf of
Diane Baklor in this case.

        I apologize for this mix-up. Because we did not receive any
correspondence relating to the pending discovery issues in the case, we did not file
any response to Mr. Applefeld's letter in October, nor did we file a Motion for
Summary Judgment.

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Because we have now received Mr. Applefeld's October 10th letter, we are now in a position to respond to the discovery issues relating to Mr. Trikeriotis and Mrs. Baklor. I ask that the Court allow us to respond to the October 10th letter by Monday, January 26, 2004, and to file an appropriate Motion for Summary Judgment motion once these outstanding discovery issues are resolved.

Respectfully submitted,

Andrew C. White

Cc: Electronically filed